

Elfego,

We were updating our Network Plan, using the template we recently received from Region IX, and we noticed several apparent redundancies. We just thought we would offer our suggestions and you could use them as you see fit. Take them for what it is worth, as just observations to help the reader more easily read a complex table. We know it is too late to address any changes this year, but maybe next year they can be addressed. We've listed them below:

One

Basic monitoring objective	NAAQS comparison
Is it suitable for comparison against the annual PM _{2.5} ?	

Under the description for Basic monitoring objective it states "NAAQS comparison", so it is redundant to have another row that asks, "Is it suitable for comparison against the annual PM_{2.5} (yes/no)?" because if it is not suitable, you cannot list "NAAQS comparison" in the Basic monitoring objective anyway.

Two

Frequency of flow rate verification for sequential PM samplers	
Frequency of flow rate verification for continuous PM samplers	
Frequency of one-point QC check for gaseous instruments	

Frequency of flow rate verification for <type of sampler> PM sampler is an unnecessary breakdown. All the equipment gets a separate column anyway, so the continuous and sequential samplers already are separated. You could answer the frequency question simply with just one row, "Frequency of flow rate verification for PM sampler(s)". You have one column for the continuous sampler and answer accordingly and the same for the sequential in its column.

If you want to eliminate yet another row, you can add the "Frequency of one-point QC check for the gaseous instruments" into the same argument. The flow rate verification is a QC check. You could say, "Frequency of QC check⁸". And, footnote "8" would say, flow rate verification for PM samplers and one-point check for gaseous instruments. Weekly, biweekly, monthly, etc. Once again, each piece of equipment gets its own column anyway, so having three rows for the same QC question, just seems a waste of space and it is harder to read with a batch of "N/A's" in your vision.

Three

Last annual performance evaluation for gaseous instruments	
Last two semi-annual flow rate audits for PM samplers	

These two rows are both audits, just stated differently. You could say, “Audit of FRM and FEM instrumentation⁹” (or something like that). And, footnote “9” would say, “Annual for gaseous instruments and semi-annual for PM samplers”.

Thanks, as always, for the lending of your “ear” Elfego. We don’t know the process involved for changing these types of items, so we don’t know if it is easy, difficult, or involved. Also, given all the technical changes that are happening, these items are trivial in the big scheme of things. We just thought we could lighten the burden of the reader of these reports.